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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
14

15 UNITED STATES OF AMERICA,)	No. CR 06-0380 SI
)	
16 Plaintiff,)	[PROPOSED] ORDER AND
)	STIPULATION EXCLUDING TIME
17 v.)	FROM THE SPEEDY TRIAL ACT
)	CALCULATION
18 OMAR WARD,)	(18 U.S.C. § 3161 (h)(8)(A))
)	
19 Defendant.)	
)	
20 _____)	

21 The parties stipulate and agree, and the Court finds and holds, as follows:

22 1. The parties appeared on the instant matter July 13, 2006 for defendant's arraignment
23 on the indictment before the Honorable Judge Nandor Vadas. On July 13, 2006, the matter was
24 continued to July 14, 2006 for initial appearance in front of the Honorable Susan Illston.

25 2. On July 14, 2006, the parties appeared in front of the Honorable Susan Illston and the
26 matter was continued to July 28, 2006 for status / trial setting.

27 3. On July 14, 2006, Assistant Federal Public Defender Ronald Tyler, who represents the
28 defendant, requested an exclusion of time from July 14, 2006 to July 28, 2006, based on effective

1 preparation of counsel. The parties moved that this same time period be excluded from the
2 calculation of time under the Speedy Trial Act.

3 4. In light of the foregoing facts, the failure to grant the requested exclusion would
4 unreasonably deny counsel for the defense the reasonable time necessary for effective
5 preparation, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(A),
6 (B)(iv). The ends of justice would be served by the Court excluding the proposed time period.
7 These ends outweigh the best interest of the public and the defendant in a speedy trial. See id. §
8 3161(h)(8)(A).

9 5. For the reasons stated, the time period from July 14, 2006 through July 28, 2006 shall
10 be excluded from the calculation of time under the Speedy Trial Act.

11
12 IT IS SO STIPULATED.

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14 DATED: July 14, 2006

Respectfully Submitted,

15
16 /S/
17 NAHLA RAJAN
Special Assistant United States Attorney

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19 DATED: July 19, 2006

/S/
20 RONALD TYLER
Counsel for Omar Ward

21
22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23
24 DATED: _____

25 THE HONORABLE SUSAN ILLSTON
26 United States District Judge